

JS 44 (Rev. 06/17)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United American Muslim Association of New York, Inc.

(b) County of Residence of First Listed Plaintiff Philadelphia County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Stan Shnyder, Esq.; Kats, Jamison & Associates  
1 Bustleton Pike, Feasterville, PA 19053  
T: (215) 396-9001 / F: (215) 396-8388

**DEFENDANTS**

Great American Insurance Group d/b/a Great American Insurance Company

County of Residence of First Listed Defendant Hamilton County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)  
Alexandra Rogin; Eckert Seamans Cherin & Mellott, LLC  
Two Liberty Place, 50 S. 16th St., Floor 22, Philadelphia, PA 19102  
T: (302) 552-293 / F: (302) 574-7401

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                                   | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1            | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4            | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6            | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input checked="" type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 <b>FEDERAL TAX SUITS</b>

**V. ORIGIN** (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. 1332

Brief description of cause:

Plaintiff alleges defendant breached an insurance policy by not paying a claim

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
264,672.06

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☐ Yes ☒ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

5/7/19

SIGNATURE OF ATTORNEY OF RECORD

Alexandra Rogin

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DESIGNATION FORM**

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: Kats, Jamison & Associates, 1 Bustleton Pike, Feasterville, PA 19053

Address of Defendant: Eckert Seamans Cherin & Mellott, LLC, Two Liberty Place, 50 S. 16th Street, Floor 22, Philadelphia, PA 19102

Place of Accident, Incident or Transaction: Pennsylvania

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 05/07/2019

Alexandra Rogin  
Attorney-at-Law / Pro Se Plaintiff

3220189

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases  
(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☒ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases  
(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, Alexandra D. Rogin, Esq., counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 05/07/2019

Alexandra Rogin  
Attorney-at-Law / Pro Se Plaintiff

322018

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DESIGNATION FORM**

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: Kats, Jamison & Associates, 1 Bustleton Pike, Feasterville, PA 19053

Address of Defendant: Eckert Seamans Cherin & Mellott, LLC, Two Liberty Place, 50 S. 16th Street, Floor 22, Philadelphia, PA 19102

Place of Accident, Incident or Transaction: Pennsylvania

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Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

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- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 05/07/2019

Alexandra Rogin  
Attorney-at-Law / Pro Se Plaintiff

3220189

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
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- ☐ 3. Jones Act-Personal Injury
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- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases  
(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☒ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases  
(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, Alexandra D. Rogin, Esq., counsel of record or pro se plaintiff, do hereby certify:

- ☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:
- ☐ Relief other than monetary damages is sought.

DATE: 05/07/2019

Alexandra Rogin  
Attorney-at-Law / Pro Se Plaintiff

322018

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

United American Muslim Association of  
New York, Inc.

:

CIVIL ACTION

v.

:

Great American Insurance Group d/b/a  
Great American Insurance Company

:

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

May 7, 2019  
Date

  
Attorney-at-law

Defendant  
Attorney for

215-851-8401

215-851-8383

arogin@eckertseamans.com

Telephone

FAX Number

E-Mail Address

**Civil Justice Expense and Delay Reduction Plan  
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS  
(See §1.02 (e) Management Track Definitions of the  
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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UNITED AMERICAN MUSLIM  
ASSOCIATION OF NEW YORK, INC.,

Plaintiff,

v.

GREAT AMERICAN INSURANCE GROUP  
D/B/A GREAT AMERICAN INSURANCE  
COMPANY,

Defendant.

---

Case No.: \_\_\_\_\_

**DEFENDANT'S NOTICE OF REMOVAL**

Defendant, Great American Insurance Company ("Great American"), incorrectly sued as Great American Insurance Group d/b/a Great American Insurance Company, hereby gives notice of the removal to this Court of the case styled *United American Muslim Association of New York, Inc. v. Great American Insurance Group d/b/a Great American Insurance Company*, Case ID 190400048 from the Philadelphia County Court of Common Pleas, Pennsylvania, pursuant to 28 U.S.C. § 1441, *et seq.*, based upon the following grounds:

1. On April 1, 2019, plaintiff, United American Muslim Association of New York, Inc. ("UAMA") filed a complaint against Great American in the Court of Common Pleas for the County of Philadelphia, Pennsylvania. (Compl., Ex. 1.)
2. By attaching a copy of the complaint hereto as Exhibit 1, Great American has complied with the requirement under 28 U.S.C. § 1446(a) that it file copies of all process, pleadings, and orders it has received in connection with the complaint.
3. Great American received the complaint via certified mail on April 18, 2019.

4. This Notice of Removal is filed within 30 days of April 18, 2019, and, therefore, removal of this action is timely under 28 U.S.C. § 1446(b).

5. This action is properly removed to this Court under 28 U.S.C. § 1441 because this district/division embraces the place where the complaint is pending.

6. Great American is the only defendant named in this action, so the requirement that all defendants consent to removal in certain circumstances does not apply. *See* 28 U.S.C. § 1446(b).

7. Removal of this action is appropriate under 28 U.S.C. § 1441(a) because the Court has original jurisdiction over this matter under 28 U.S.C. § 1332(a) since the parties are citizens of different states and the amount in controversy exceeds \$75,000 exclusive of interest.

8. Great American is a citizen of Ohio under 28 U.S.C. § 1332(c)(1) because it was incorporated by, and maintains its principal place of business in, Ohio.

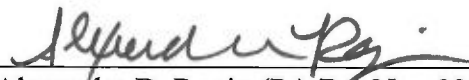
9. UAMA is a citizen of New York under 28 U.S.C. § 1332(c)(1) because it was incorporated by New York, and, upon information and belief, maintains its principal place of business in New York.

10. The fact that UAMA seeks to recover an amount in excess of \$75,000 is demonstrated by the estimate for repairs attached to the complaint as Exhibit A. (*See* Compl., Ex. 1, at Ex. A (p. 19))

11. Pursuant to 28 U.S.C. § 1446(d), Great American will promptly file a copy of this notice of removal with the Philadelphia County Court of Common Pleas, Pennsylvania, and serve it on counsel for UAMA.

12. Written notice of the filing of this Notice of Removal will be promptly served upon Plaintiff.

Respectfully submitted,



Alexandra D. Rogin (PA Bar No.: 322018)  
**ECKERT SEAMANS CHERIN & MELLOTT, LLC**  
Two Liberty Place  
50 South 16th Street  
22nd Floor  
Philadelphia, PA 19102  
Tel: (215) 851-8401  
Fax: (215) 851-8383  
Email: arogin@eckertseamans.com

Michael A. Graziano (*pro hac vice* anticipated)  
**ECKERT SEAMANS CHERIN & MELLOTT, LLC**  
1717 Pennsylvania Avenue, N.W., Suite 1200  
Washington, D.C. 20006  
Tel: (202) 659-6671  
Fax: (202) 659-6699  
Email: mgraziano@eckertseamans.com

*Counsel for Defendant*



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Defendant's Notice of Removal** was served via email and first-class U.S. Mail, postage prepaid, this 7th day of May, 2019, on the following counsel of record:

Stan Shnayder, Esq.  
Kats, Jamison & Associates  
1 Bustleton Pike  
Feasterville, PA 19053

Steven Feinstein, Esq.  
Feinstein Law Office  
107 Wayne Court  
West Chester, PA 19380

*Counsel for Plaintiff*

  
Alexandra Rogin, Esq.

## **Exhibit A**

**KATS, JAMISON & ASSOCIATES**  
 By: STAN SHNAYDER, ESQUIRE  
 Identification No.: 310913  
 1 Bustleton Pike  
 Feasterville, PA 19053  
 (215) 396-9001

Filed and Attested by the  
 MAJOR CASE Judicial Records  
 01 APR 2019 10:26 am  
 M. BRYANT

Attorney for Plaintiff

UNITED AMERICAN MUSLIM  
 ASSOCIATION OF NEW YORK, INC.  
 4800 Beaver Dam Road  
 Bristol PA 19007

PHILADELPHIA COUNTY  
 COURT OF COMMON PLEAS

APRIL TERM, 2019  
 No.

v.

GREAT AMERICAN INSURANCE GROUP  
 D/B/A GREAT AMERICAN INSURANCE  
 COMPANY  
 301 E. Fourth Street  
 Cincinnati, OH 45202

**NOTICE TO DEFEND  
 COMPLAINT IN CIVIL ACTION**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. *You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
 Lawyer Referral and Information Service  
 One Reading Center  
 Philadelphia, Pennsylvania 19107  
 (215) 238-6333  
 TTY (215) 451-6197

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Asociacion De Licenciados  
 De Filadelfia  
 Servicio De Referencia E  
 Informacion Legal  
 One Reading Center  
 Filadelfia, Pennsylvania 19107  
 (215) 238-6333  
 TTY (215) 451-6197

**KATS, JAMISON & ASSOCIATES**  
 By: STAN SHNAYDER, ESQUIRE  
 Identification No.: 310913  
 1 Bustleton Pike  
 Feasterville, PA 19053  
 (215) 396-9001

MAJOR CASE

Attorney for Plaintiff

UNITED AMERICAN MUSLIM  
 ASSOCIATION OF NEW YORK, INC.  
 4800 Beaver Dam Road  
 Bristol PA 19007

PHILADELPHIA COUNTY  
 COURT OF COMMON PLEAS

APRIL TERM, 2019  
 No.

v.

GREAT AMERICAN INSURANCE GROUP  
 D/B/A GREAT AMERICAN INSURANCE  
 COMPANY  
 301 E. Fourth Street  
 Cincinnati, OH 45202

**CIVIL ACTION**

1. Plaintiff, United American Muslim Association of New York, Inc., is a corporation organized and existing under the laws of the State of New York, authorized to do business in the Commonwealth of Pennsylvania and having offices located at 4800 Beaver Dam Road, Bristol PA 19007

2. Defendant, Great American Insurance Group d/b/a Great American Insurance Company, is a corporation duly organized and existing which is licensed to issue policies of insurance in the Commonwealth of Pennsylvania and maintains its principal place of business at 301 E. Fourth Street, Cincinnati, OH 45202. Defendant regularly conducts business in the City and County of Philadelphia.

3. Defendant in its regular course of business issued to Plaintiff a policy of insurance, policy number PAC 174-33-91-00 covering a property Plaintiff owns located and situate as 5201 Emilie Road Levittown, PA 19057. Plaintiff is not in possession of the entire policy and it is alleged that said policy is in the possession of Defendant.



4. At all times material hereto, Defendant was acting either individually or through its duly authorized agents, servants, workmen or employees, who were acting within the course and scope of their employment and on the business of said employer.

5. On or about January 9, 2018, while said policy of insurance was in full force and effect, Plaintiff suffered a sudden and accidental direct physical loss to the insured premises, resulting in damage to the insured premises in those areas and to the extent set forth in the building estimate of JS Held, a true and correct copy of which is attached hereto, made part hereof, and marked Exhibit "A".

6. Notice of Plaintiff's covered loss was given to Defendant in a prompt and timely manner and Plaintiff has done and otherwise performed all things required of them under the policy of insurance issued by Defendant, including cooperating with Defendant's investigation; mitigating damages where reasonable, required and/or possible; providing Defendant with all available information and complying with all conditions precedent.

7. Defendant, despite demand for benefits under its policy of insurance has failed and refused to pay to Plaintiffs those benefits due and owing under said policy of insurance.

8. Defendant has breached its contractual obligations to pay benefits to Plaintiffs for a loss covered under Defendant's policy of insurance.

9. Solely as a result of Defendant's failure and refusal to pay benefits to Plaintiffs as required under the aforementioned policy of insurance, Plaintiffs have suffered loss and damage in an amount in excess of \$50,000.00.

WHEREFORE, Plaintiffs demand judgment against Defendant in an amount in excess of \$50,000.00 together with interest and costs.

**KATS, JAMISON & ASSOCIATES**

BY: 

STAN SHNAYDER, ESQUIRE  
Attorney for Plaintiff

Date: April 1, 2019

VERIFICATION

Plaintiff hereby states that that the statements made in the foregoing complaint are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

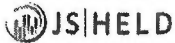


Erdinc Turkmen on behalf  
of United American Muslim Association

Date: 3/29/2019

# EXHIBIT “A”





1845 Walnut St. Suite 2300  
Philadelphia, PA 19103  
(P) 267-479-0410  
(F) 267-479-0415

Client: United American Muslim  
Property: 5201 Emile Rd.  
Levittown, PA 19057

Operator: PHASAN

Type of Estimate: <NONE>

Date Entered: 3/5/2018

Date Assigned:

Price List: PAPH8X FEB18

Labor Efficiency: Restoration/Service/Remodel

Estimate: 18010765-UNITED-MUSL

This estimate is based on a site inspection completed by Patrick Hasan on 02/14/18 & 02/27/2018.

This opinion of probable cost is based on the level of detail of "as-built" conditions provided to us by site inspections. We have not been provided any plans for the structure, nor was demolition complete at time of inspection.

**General Building Description:** School

**Cause of Damage:** Water via frozen pipes

**Scope Recap:** Removal and replacement/repair of water damaged interior finishes & components. This opinion reflects J.S. Held's assumption of the pre-loss configuration. The pricing contemplates the use of contemporary materials of "like, kind and quality". Furthermore, this evaluation is governed by the following assumptions and exclusions.

**Assumptions:**

- Access given by Insured Representatives
- Environmental Report prepared by LEA
- Field Measurements
- Floor Plans by Insured
- Information and documentation received and reviewed to date

**Exclusions:**

- ACM/Lead/Mold separate
- Code Upgrades (Unless it is included above)
- Permit fees (excluded/TBD)
- Architectural & Engineering fees (excluded/TBD)

This estimate is subject to review by the Insurance Carrier(s) per contract/policy terms and conditions.

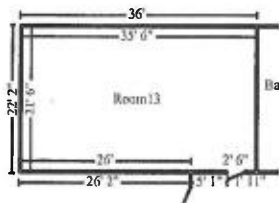
J.S. Held LLC recommends that all costs that are anticipated to be part of the claim are submitted for review prior to executing contracts. To the extent that repair costs proceed on a time and materials basis, we recommend that the adjustment team monitor these repairs and that the insured keep appropriate records, sign in sheets and documentation of these repairs. This document is prepared for the adjustment team. Reliance upon this document are for the sole use of the intended recipients. J.S. Held LLC reserves the right to change their opinion should further information become available following the preparation of this presentation.



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## 18010765-UNITED-MUSL

## 2nd Floor



## Room13

Height: 8'

912.77 SF Walls  
1677.46 SF Walls & Ceiling  
84.97 SY Flooring  
114.10 LF Ceil. Perimeter

764.69 SF Ceiling  
764.69 SF Floor  
114.10 LF Floor Perimeter

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
1. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	191.17 SF	1.84	5.62	71.46	428.83	(146.39)	282.44
2. R&R Acoustic ceiling tile furring	191.17 SF	0.81	2.29	31.44	188.58	(55.13)	133.45
3. R&R Acoustic ceiling tile	191.17 SF	3.43	17.55	134.66	807.93	(291.14)	516.79
4. Seal & paint acoustic ceiling tile	764.69 SF	0.95	13.31	147.96	887.73	(443.87)	443.86
5. R&R Fluorescent light fixture	2.00 EA	112.41	6.27	46.22	277.31	(249.21)	28.10
6. Paint masonry	912.77 SF	0.69	15.33	129.02	774.16	(387.10)	387.06
7. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
8. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>HAZ-MAT</b>							
9. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
10. Tear out asbestos vinyl floor covering (no haul off)	764.69 SF	2.84	7.80	435.90	2,615.42	(0.00)	2,615.42
11. Remove asbestos floor mastic (no haul off)	764.69 SF	3.47	2.29	531.16	3,186.92	(0.00)	3,186.92
12. HEPA Vacuuming - Detailed - (PER SF)	764.69 SF	0.75	41.29	114.70	729.51	(0.00)	729.51
13. Clean the floor	764.69 SF	0.50	28.02	76.58	486.95	(0.00)	486.95
14. Floor leveling cement / patch-in	764.69 SF	2.50	34.41	389.22	2,335.36	(2,335.36)	0.00
15. Vinyl tile	764.69 SF	3.51	101.40	557.10	3,342.56	(3,342.56)	0.00
16. Cove base molding - rubber or vinyl, 6" high	114.10 LF	2.46	11.64	58.46	350.79	(350.79)	0.00
<b>Totals: Room13</b>			<b>289.22</b>	<b>2,738.24</b>	<b>16,499.59</b>	<b>7,634.06</b>	<b>8,865.53</b>

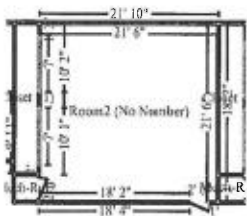


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**Bathroom-1****Height: 8'**

536.46 SF Walls	227.32 SF Ceiling
763.78 SF Walls & Ceiling	227.32 SF Floor
25.26 SY Flooring	67.06 LF Floor Perimeter
67.06 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
17. General Demolition - per hour - labor time to remove/dispose of portion of plaster ceiling & lath*	24.00 HR	42.03	0.00	201.74	1,210.46	(0.00)	1,210.46
18. R&R Suspended ceiling system - 2' x 4'	227.32 SF	3.36	18.55	156.48	938.82	(357.65)	581.17
19. R&R Fluorescent - acoustic grid fixture - 4 tube - High grd	2.00 EA	367.33	25.23	151.96	911.85	(883.75)	28.10
20. Seal/prime then paint more than the ceiling perimeter (2 coats)	223.52 SF	0.74	2.15	33.52	201.07	(100.54)	100.53
21. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
<b>Totals: Bathroom-1</b>			<b>46.17</b>	<b>548.60</b>	<b>3,291.66</b>	<b>1,356.68</b>	<b>1,934.98</b>

**Room2 (No Number)****Height: 8'**

595.13 SF Walls	462.87 SF Ceiling
1057.99 SF Walls & Ceiling	462.87 SF Floor
51.43 SY Flooring	72.06 LF Floor Perimeter
86.06 LF Ceil. Perimeter	

**Subroom: Closet (1)****Height: 8'**

245.79 SF Walls	54.59 SF Ceiling
300.38 SF Walls & Ceiling	54.59 SF Floor
6.07 SY Flooring	28.39 LF Floor Perimeter
42.39 LF Ceil. Perimeter	

Missing Wall - Goes to Floor

7' X 6' 8"

Opens into ROOM2\_NO\_NU

Missing Wall - Goes to Floor

7' X 6' 8"

Opens into ROOM2\_NO\_NU

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
22. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	54.59 SF	1.84	1.61	20.40	122.46	(41.80)	80.66
23. R&R Acoustic ceiling tile furring	54.59 SF	0.81	0.66	9.00	53.88	(15.74)	38.14

18010765-UNITED-MUSL

12/4/2018

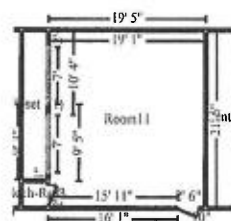
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1845 Walnut St. Suite 2300  
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## CONTINUED - Room2 (No Number)

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
24. R&R Acoustic ceiling tile	54.59 SF	3.43	5.01	38.46	230.72	(83.14)	147.58
25. Seal & paint acoustic ceiling tile	54.59 SF	0.95	0.95	10.58	63.39	(31.71)	31.68
26. Paint masonry	840.92 SF	0.69	14.13	118.86	713.22	(356.63)	356.59
27. Paint door/window trim & jamb - 2 coats (per side)	2.00 EA	24.32	0.48	9.82	58.94	(29.48)	29.46
28. Paint door slab only - 2 coats (per side)	2.00 EA	29.22	0.79	11.84	71.07	(35.54)	35.53
<b>HAZ-MAT</b>							
29. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
30. Tear out asbestos vinyl floor covering (no haul off)	517.45 SF	2.84	5.28	294.98	1,769.82	(0.00)	1,769.82
31. Remove asbestos floor mastic (no haul off)	517.45 SF	3.47	1.55	359.44	2,156.54	(0.00)	2,156.54
32. HEPA Vacuuming - Detailed - (PER SF)	517.45 SF	0.75	27.95	77.62	493.66	(0.00)	493.66
33. Clean the floor	517.45 SF	0.50	18.96	51.80	329.49	(0.00)	329.49
34. Floor leveling cement / patch-in	517.45 SF	2.50	23.29	263.38	1,580.30	(1,580.30)	0.00
35. Vinyl tile	517.45 SF	3.51	68.61	376.98	2,261.84	(2,261.84)	0.00
36. Cove base molding - rubber or vinyl, 6" high	100.45 LF	2.46	10.25	51.48	308.84	(308.84)	0.00
<b>Totals: Room2 (No Number)</b>			<b>180.88</b>	<b>1,698.18</b>	<b>10,236.71</b>	<b>4,745.02</b>	<b>5,491.69</b>



Room11

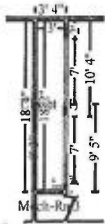
Height: 8'

556.88 SF Walls	411.40 SF Ceiling
968.28 SF Walls & Ceiling	411.40 SF Floor
45.71 SY Flooring	67.28 LF Floor Perimeter
81.28 LF Ceil. Perimeter	





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**Subroom: Closet (1)****Height: 8'**

245.79 SF Walls	54.59 SF Ceiling
300.38 SF Walls & Ceiling	54.59 SF Floor
6.07 SY Flooring	28.39 LF Floor Perimeter
42.39 LF Ceil. Perimeter	

**Missing Wall - Goes to Floor****7' X 6' 8"****Opens into ROOM1****Missing Wall - Goes to Floor****7' X 6' 8"****Opens into ROOM1**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
37. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	54.59 SF	1.84	1.61	20.40	122.46	(41.80)	80.66
38. R&R Acoustic ceiling tile furring	54.59 SF	0.81	0.66	9.00	53.88	(15.74)	38.14
39. R&R Acoustic ceiling tile	54.59 SF	3.43	5.01	38.46	230.72	(83.14)	147.58
40. Seal & paint acoustic ceiling tile	54.59 SF	0.95	0.95	10.58	63.39	(31.71)	31.68
41. Paint masonry	802.67 SF	0.69	13.49	113.46	680.79	(340.41)	340.38
42. Detach & Reset Classroom cabinetry - coat hook bar*	54.59 LF	7.00	0.00	76.42	458.55	(0.00)	458.55
43. Paint door/window trim & jamb - 2 coats (per side)	2.00 EA	24.32	0.48	9.82	58.94	(29.48)	29.46
44. Paint door slab only - 2 coats (per side)	2.00 EA	29.22	0.79	11.84	71.07	(35.54)	35.53
<b>HAZ-MAT</b>							
45. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
46. Tear out asbestos vinyl floor covering (no haul off)	465.99 SF	2.84	4.75	265.64	1,593.80	(0.00)	1,593.80
47. Remove asbestos floor mastic (no haul off)	465.99 SF	3.47	1.40	323.68	1,942.07	(0.00)	1,942.07
48. HEPA Vacuuming - Detailed - (PER SF)	465.99 SF	0.75	25.16	69.90	444.55	(0.00)	444.55
49. Clean the floor	465.99 SF	0.50	17.08	46.66	296.74	(0.00)	296.74
50. Floor leveling cement / patch-in	465.99 SF	2.50	20.97	237.20	1,423.15	(1,423.15)	0.00
51. Vinyl tile	465.99 SF	3.51	61.79	339.48	2,036.89	(2,036.89)	0.00
52. Cove base molding - rubber or vinyl, 6" high	95.67 LF	2.46	9.76	49.04	294.15	(294.15)	0.00
<b>Totals: Room11</b>			<b>165.26</b>	<b>1,625.12</b>	<b>9,793.69</b>	<b>4,332.01</b>	<b>5,461.68</b>

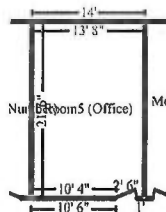


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**Room4 (No Number)****Height: 8'**

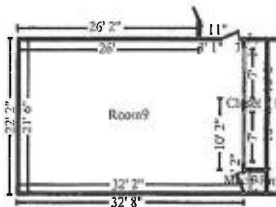
472.04 SF Walls	171.67 SF Ceiling
643.71 SF Walls & Ceiling	171.67 SF Floor
19.07 SY Flooring	59.01 LF Floor Perimeter
59.01 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
53. Floor prep (scrape rubber back residue)	171.67 SF	0.59	0.00	20.26	121.55	(121.55)	0.00
54. Glue down carpet	197.42 SF	2.25	20.14	92.86	557.20	(557.20)	0.00
15 % waste added for Glue down carpet.							
55. Cove base molding - rubber or vinyl, 4" high	59.01 LF	1.93	4.14	23.60	141.63	(141.63)	0.00
<b>Totals: Room4 (No Number)</b>			<b>24.28</b>	<b>136.72</b>	<b>820.38</b>	<b>820.38</b>	<b>0.00</b>

**Room5 (Office)****Height: 8'**

563.13 SF Walls	294.23 SF Ceiling
857.35 SF Walls & Ceiling	294.23 SF Floor
32.69 SY Flooring	70.39 LF Floor Perimeter
70.39 LF Ceil. Perimeter	

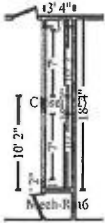
DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
56. Floor prep (scrape rubber back residue)	294.23 SF	0.59	0.00	34.72	208.32	(208.32)	0.00
57. Glue down carpet	338.36 SF	2.25	34.51	159.16	954.98	(954.98)	0.00
15 % waste added for Glue down carpet.							
58. Cove base molding - rubber or vinyl, 4" high	70.39 LF	1.93	4.94	28.16	168.95	(168.95)	0.00
<b>Totals: Room5 (Office)</b>			<b>39.45</b>	<b>222.04</b>	<b>1,332.25</b>	<b>1,332.25</b>	<b>0.00</b>

**Room9****Height: 8'**

766.10 SF Walls	692.92 SF Ceiling
1459.03 SF Walls & Ceiling	692.92 SF Floor
76.99 SY Flooring	93.43 LF Floor Perimeter
107.43 LF Ceil. Perimeter	



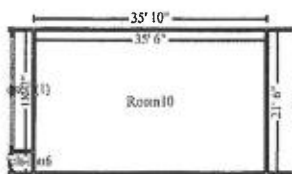
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**Subroom: Closet (1)****Height: 8'**

245.33 SF Walls	54.50 SF Ceiling
299.83 SF Walls & Ceiling	54.50 SF Floor
6.06 SY Flooring	28.33 LF Floor Perimeter
42.33 LF Ceil. Perimeter	

**Missing Wall - Goes to Floor****7' X 6' 8"****Opens into ROOM9****Missing Wall - Goes to Floor****7' X 6' 8"****Opens into ROOM9**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
<b>HAZ-MAT</b>							
59. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
60. Tear out asbestos vinyl floor covering (no haul off)	747.42 SF	2.84	7.62	426.06	2,556.35	(0.00)	2,556.35
61. Remove asbestos floor mastic (no haul off)	747.42 SF	3.47	2.24	519.16	3,114.95	(0.00)	3,114.95
62. HEPA Vacuuming - Detailed - (PER SF)	747.42 SF	0.75	40.36	112.12	713.05	(0.00)	713.05
63. Clean the floor	747.42 SF	0.50	27.39	74.84	475.94	(0.00)	475.94
64. Floor leveling cement / patch-in	747.42 SF	2.50	33.63	380.44	2,282.62	(2,282.62)	0.00
65. Vinyl tile	747.42 SF	3.51	99.11	544.50	3,267.05	(3,267.05)	0.00
66. Cove base molding - rubber or vinyl, 6" high	121.76 LF	2.46	12.42	62.38	374.33	(374.33)	0.00
67. Paint masonry	1,011.44 SF	0.69	16.99	142.98	857.86	(428.95)	428.91
68. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
69. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>Totals: Room9</b>			<b>241.76</b>	<b>2,276.84</b>	<b>13,729.69</b>	<b>6,385.46</b>	<b>7,344.23</b>

**Room10****Height: 8'**

912.77 SF Walls	764.69 SF Ceiling
1677.46 SF Walls & Ceiling	764.69 SF Floor
84.97 SY Flooring	114.10 LF Floor Perimeter
114.10 LF Ceil. Perimeter	

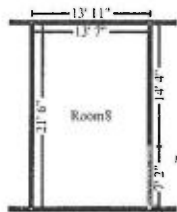
DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
<b>HAZ-MAT</b>							
70. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54



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## CONTINUED - Room10

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
71. Tear out asbestos vinyl floor covering (no haul off)	764.69 SF	2.84	7.80	435.90	2,615.42	(0.00)	2,615.42
72. Remove asbestos floor mastic (no haul off)	764.69 SF	3.47	2.29	531.16	3,186.92	(0.00)	3,186.92
73. HEPA Vacuuming - Detailed - (PER SF)	764.69 SF	0.75	41.29	114.70	729.51	(0.00)	729.51
74. Clean the floor	764.69 SF	0.50	28.02	76.58	486.95	(0.00)	486.95
75. Floor leveling cement / patch-in	764.69 SF	2.50	34.41	389.22	2,335.36	(2,335.36)	0.00
76. Vinyl tile	764.69 SF	3.51	101.40	557.10	3,342.56	(3,342.56)	0.00
77. Cove base molding - rubber or vinyl, 6" high	114.10 LF	2.46	11.64	58.46	350.79	(350.79)	0.00
78. Paint masonry	912.77 SF	0.69	15.33	129.02	774.16	(387.10)	387.06
79. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
80. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>Totals: Room10</b>			244.18	2,306.50	13,909.21	6,448.32	7,460.89



## Room8

Height: 8'

513.70 SF Walls	292.01 SF Ceiling
805.72 SF Walls & Ceiling	292.01 SF Floor
32.45 SY Flooring	63.02 LF Floor Perimeter
70.19 LF Ceil. Perimeter	

Missing Wall - Goes to Floor

7' 2" X 6' 8"

Opens into ROOM8

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
<b>HAZ-MAT</b>							
81. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
82. Tear out asbestos vinyl floor covering (no haul off)	292.01 SF	2.84	2.98	166.46	998.75	(0.00)	998.75
83. Remove asbestos floor mastic (no haul off)	292.01 SF	3.47	0.88	202.84	1,216.99	(0.00)	1,216.99
84. HEPA Vacuuming - Detailed - (PER SF)	292.01 SF	0.75	15.77	43.80	278.58	(0.00)	278.58
85. Clean the floor	292.01 SF	0.50	10.70	29.24	185.95	(0.00)	185.95
86. Floor leveling cement / patch-in	292.01 SF	2.50	13.14	148.62	891.79	(891.79)	0.00

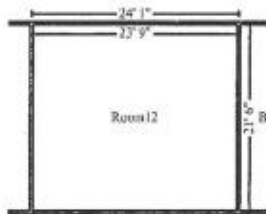




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## CONTINUED - Room8

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
87. Vinyl tile	292.01 SF	3.51	38.72	212.74	1,276.42	(1,276.42)	0.00
88. Cove base molding - rubber or vinyl, 6" high	63.02 LF	2.46	6.43	32.28	193.74	(193.74)	0.00
89. Paint masonry	513.70 SF	0.69	8.63	72.62	435.70	(217.87)	217.83
90. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
91. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>Totals: Room8</b>			<b>99.25</b>	<b>922.96</b>	<b>5,565.46</b>	<b>2,612.33</b>	<b>2,953.13</b>



## Room12

Height: 8'

723.98 SF Walls	510.66 SF Ceiling
1234.64 SF Walls & Ceiling	510.66 SF Floor
56.74 SY Flooring	90.50 LF Floor Perimeter
90.50 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
92. Remove Glue down carpet	510.66 SF	0.53	0.00	54.14	324.79	(0.00)	324.79
93. Glue down carpet	587.26 SF	2.25	59.90	276.24	1,657.48	(1,657.48)	0.00
15 % waste added for Glue down carpet.							
94. Floor prep (scrape rubber back residue)	510.66 SF	0.59	0.00	60.26	361.55	(361.55)	0.00
95. Cove base molding - rubber or vinyl, 6" high	90.50 LF	2.46	9.23	46.36	278.22	(278.22)	0.00
<b>Totals: Room12</b>			<b>69.13</b>	<b>437.00</b>	<b>2,622.04</b>	<b>2,297.25</b>	<b>324.79</b>

## Corridor

Height: 8'

2419.81 SF Walls	1382.96 SF Ceiling
3802.77 SF Walls & Ceiling	1382.96 SF Floor
153.66 SY Flooring	301.98 LF Floor Perimeter
304.98 LF Ceil. Perimeter	

Missing Wall - Goes to Floor

3' X 6' 8"

Opens into WOMENS\_BATH

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12/4/2018

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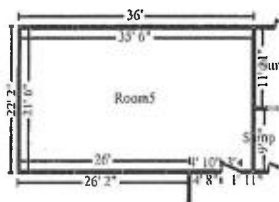


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DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
96. Clean floor, strip & wax	1,382.96 SF	0.73	80.69	203.42	1,293.67	(0.00)	1,293.67
<b>Totals: Corridor</b>			<b>80.69</b>	<b>203.42</b>	<b>1,293.67</b>	<b>0.00</b>	<b>1,293.67</b>

**Total: 2nd Floor** 1,480.27 13,115.62 79,094.35 37,963.76 41,130.59

### Main Level



### Room 5

Height: 8'

912.77 SF Walls  
1677.46 SF Walls & Ceiling  
84.97 SY Flooring  
114.10 LF Ceil. Perimeter

764.69 SF Ceiling  
764.69 SF Floor  
114.10 LF Floor Perimeter

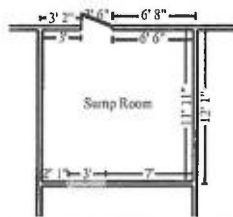
DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
97. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	191.17 SF	1.84	5.62	71.46	428.83	(146.39)	282.44
98. R&R Acoustic ceiling tile furring	191.17 SF	0.81	2.29	31.44	188.58	(55.13)	133.45
99. R&R Acoustic ceiling tile	191.17 SF	3.43	17.55	134.66	807.93	(291.14)	516.79
100. Seal & paint acoustic ceiling tile	764.69 SF	0.95	13.31	147.96	887.73	(443.87)	443.86
101. R&R Fluorescent light fixture	2.00 EA	112.41	6.27	46.22	277.31	(249.21)	28.10
102. Remove Chalkboards, Tackboards, & Markerboards	42.00 SF	0.33	0.00	2.78	16.64	(0.00)	16.64
103. Install Chalkboards, Tackboards, & Markerboards	42.00 SF	2.21	0.00	18.56	111.38	(0.00)	111.38
104. Paint masonry	912.77 SF	0.69	15.33	129.02	774.16	(387.10)	387.06
105. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
106. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>HAZ-MAT</b>							
107. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
108. Tear out asbestos vinyl floor covering (no haul off)	764.69 SF	2.84	7.80	435.90	2,615.42	(0.00)	2,615.42
109. Remove asbestos floor mastic (no haul off)	764.69 SF	3.47	2.29	531.16	3,186.92	(0.00)	3,186.92
110. HEPA Vacuuming - Detailed - (PER SF)	764.69 SF	0.75	41.29	114.70	729.51	(0.00)	729.51
111. Clean the floor	764.69 SF	0.50	28.02	76.58	486.95	(0.00)	486.95
112. Floor leveling cement / patch-in	764.69 SF	2.50	34.41	389.22	2,335.36	(2,335.36)	0.00
113. Vinyl tile	764.69 SF	3.51	101.40	557.10	3,342.56	(3,342.56)	0.00
114. Cove base molding - rubber or vinyl, 6" high	114.10 LF	2.46	11.64	58.46	350.79	(350.79)	0.00



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## CONTINUED - Room5

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
<b>Totals: Room5</b>			289.22	2,759.58	16,627.61	7,634.06	8,993.55



Sump Room

Height: 8'

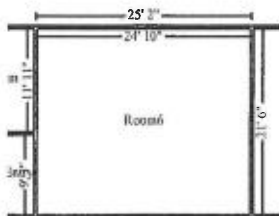
363.21 SF Walls	143.41 SF Ceiling
506.61 SF Walls & Ceiling	143.41 SF Floor
15.93 SY Flooring	44.90 LF Floor Perimeter
47.90 LF Ceil. Perimeter	

Missing Wall - Goes to Floor

3' X 6' 8"

Opens into SUMP\_PUMP\_EN

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
115. Stucco patch / small repair - ready for color	1.00 EA	170.02	0.96	34.20	205.18	(129.25)	75.93
116. Seal & paint stucco	143.41 SF	1.16	2.32	33.74	202.42	(101.22)	101.20
117. Paint masonry	363.21 SF	0.69	6.10	51.34	308.05	(154.04)	154.01
118. Paint concrete the floor	143.41 SF	0.74	1.64	21.54	129.30	(64.66)	64.64
<b>Totals: Sump Room</b>			11.02	140.82	844.95	449.17	395.78



Room6

Height: 8'

741.79 SF Walls	534.63 SF Ceiling
1276.42 SF Walls & Ceiling	534.63 SF Floor
59.40 SY Flooring	92.72 LF Floor Perimeter
92.72 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
119. R&R Acoustic ceiling tile	12.00 SF	3.43	1.10	8.46	50.72	(18.27)	32.45
120. Seal & paint acoustic ceiling tile	534.63 SF	0.95	9.30	103.44	620.64	(310.32)	310.32
<b>Totals: Room6</b>			10.40	111.90	671.36	328.59	342.77

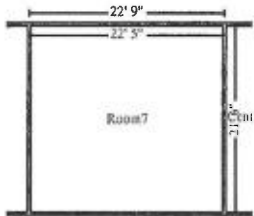


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**Room 1****Height: 8'**

708.83 SF Walls	490.28 SF Ceiling
1199.11 SF Walls & Ceiling	490.28 SF Floor
54.48 SY Flooring	88.60 LF Floor Perimeter
88.60 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
121. R&R Acoustic ceiling tile	122.57 SF	3.43	11.25	86.34	518.01	(186.67)	331.34
122. Seal & paint acoustic ceiling tile	490.28 SF	0.95	8.53	94.86	569.16	(284.60)	284.56
<b>Totals: Room 1</b>			<b>19.78</b>	<b>181.20</b>	<b>1,087.17</b>	<b>471.27</b>	<b>615.90</b>

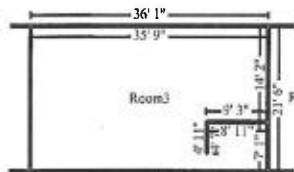
**Room 7****Height: 8'**

703.54 SF Walls	483.16 SF Ceiling
1186.71 SF Walls & Ceiling	483.16 SF Floor
53.68 SY Flooring	87.94 LF Floor Perimeter
87.94 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
123. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	120.79 SF	1.84	3.55	45.18	270.99	(92.50)	178.49
124. R&R Acoustic ceiling tile furring	120.79 SF	0.81	1.45	19.86	119.15	(34.82)	84.33
125. R&R Acoustic ceiling tile	120.79 SF	3.43	11.09	85.08	510.48	(183.96)	326.52
126. Seal & paint acoustic ceiling tile	483.16 SF	0.95	8.41	93.48	560.89	(280.45)	280.44
127. Paint masonry	703.54 SF	0.69	11.82	99.44	596.70	(298.35)	298.35
128. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
129. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>Totals: Room 7</b>			<b>36.96</b>	<b>353.86</b>	<b>2,123.21</b>	<b>922.59</b>	<b>1,200.62</b>



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Room3

Height: 8'

1137.52 SF Walls	764.99 SF Ceiling
1902.51 SF Walls & Ceiling	764.99 SF Floor
85.00 SY Flooring	142.19 LF Floor Perimeter
142.19 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
130. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	191.25 SF	1.84	5.62	71.50	429.02	(146.44)	282.58
131. R&R Acoustic ceiling tile furring	191.25 SF	0.81	2.30	31.44	188.65	(55.13)	133.52
132. R&R Acoustic ceiling tile	191.25 SF	3.43	17.56	134.72	808.27	(291.29)	516.98
133. Seal & paint acoustic ceiling tile	764.99 SF	0.95	13.31	148.00	888.05	(444.03)	444.02
134. R&R Fluorescent light fixture	2.00 EA	112.41	6.27	46.22	277.31	(249.21)	28.10
135. Paint masonry	1,137.52 SF	0.69	19.11	160.80	964.80	(482.41)	482.39
136. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
137. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>HAZ-MAT</b>							
138. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
139. Tear out asbestos vinyl floor covering (no haul off)	764.99 SF	2.84	7.80	436.08	2,616.45	(0.00)	2,616.45
140. Remove asbestos floor mastic (no haul off)	764.99 SF	3.47	2.30	531.36	3,188.18	(0.00)	3,188.18
141. HEPA Vacuuming - Detailed - (PER SF)	764.99 SF	0.75	41.30	114.74	729.78	(0.00)	729.78
142. Clean the floor	764.99 SF	0.50	28.04	76.60	487.14	(0.00)	487.14
143. Floor leveling cement / patch-in	764.99 SF	2.50	34.42	389.38	2,336.28	(2,336.28)	0.00
144. Vinyl tile	764.99 SF	3.51	101.44	557.30	3,343.85	(3,343.85)	0.00
145. Cove base molding - rubber or vinyl, 6" high	142.19 LF	2.46	14.50	72.86	437.15	(437.15)	0.00
<b>Totals: Room3</b>			<b>295.97</b>	<b>2,785.36</b>	<b>16,782.47</b>	<b>7,818.30</b>	<b>8,964.17</b>



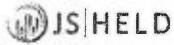
Room8

Height: 8'

696.04 SF Walls	473.07 SF Ceiling
1169.11 SF Walls & Ceiling	473.07 SF Floor
52.56 SY Flooring	87.01 LF Floor Perimeter
87.01 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
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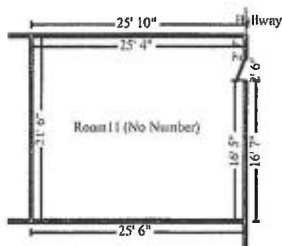




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## CONTINUED - Room8

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
146. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile*	118.27 SF	1.84	3.48	44.22	265.31	(90.57)	174.74
147. R&R Acoustic ceiling tile furring	118.27 SF	0.81	1.42	19.44	116.66	(34.10)	82.56
148. R&R Acoustic ceiling tile	118.27 SF	3.43	10.86	83.30	499.83	(180.12)	319.71
149. Seal & paint acoustic ceiling tile	473.07 SF	0.95	8.23	91.52	549.17	(274.59)	274.58
150. R&R Fluorescent light fixture	2.00 EA	112.41	6.27	46.22	277.31	(249.21)	28.10
151. Paint masonry	696.04 SF	0.69	11.69	98.40	590.36	(295.19)	295.17
152. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	24.32	0.24	4.90	29.46	(14.74)	14.72
153. Paint door slab only - 2 coats (per side)	1.00 EA	29.22	0.40	5.92	35.54	(17.77)	17.77
<b>HAZ-MAT</b>							
154. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	21.00 SF	0.84	1.36	3.54	22.54	(0.00)	22.54
155. Tear out asbestos vinyl floor covering (no haul off)	473.07 SF	2.84	4.83	269.66	1,618.01	(0.00)	1,618.01
156. Remove asbestos floor mastic (no haul off)	473.07 SF	3.47	1.42	328.60	1,971.57	(0.00)	1,971.57
157. HEPA Vacuuming - Detailed - (PER SF)	473.07 SF	0.75	25.55	70.96	451.31	(0.00)	451.31
158. Clean the floor	473.07 SF	0.50	17.33	47.36	301.23	(0.00)	301.23
159. Floor leveling cement / patch-in	473.07 SF	2.50	21.29	240.80	1,444.77	(1,444.77)	0.00
160. Vinyl tile	473.07 SF	3.51	62.73	344.64	2,067.85	(2,067.85)	0.00
161. Cove base molding - rubber or vinyl, 6" high	87.01 LF	2.46	8.88	44.58	267.50	(267.50)	0.00
<b>Totals: Room8</b>			<b>185.98</b>	<b>1,744.06</b>	<b>10,508.42</b>	<b>4,936.41</b>	<b>5,572.01</b>



## Room11 (No Number)

Height: 8'

750.27 SF Walls	546.04 SF Ceiling
1296.31 SF Walls & Ceiling	546.04 SF Floor
60.67 SY Flooring	93.78 LF Floor Perimeter
93.78 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
162. R&R Fluorescent light fixture	2.00 EA	112.41	6.27	46.22	277.31	(249.21)	28.10



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## CONTINUED - Room11 (No Number)

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
163. Detach & Reset Fluorescent light fixture	2.00 EA	72.64	0.00	29.06	174.34	(0.00)	174.34
164. R&R Acoustic ceiling tile furring	546.04 SF	0.81	6.55	89.78	538.62	(157.42)	381.20
165. R&R Acoustic ceiling tile	546.04 SF	3.43	50.13	384.60	2,307.65	(831.61)	1,476.04
<b>Totals: Room11 (No Number)</b>			<b>62.95</b>	<b>549.66</b>	<b>3,297.92</b>	<b>1,238.24</b>	<b>2,059.68</b>



## Room9 (No Number)

Height: 8'

723.98 SF Walls	510.66 SF Ceiling
1234.64 SF Walls & Ceiling	510.66 SF Floor
56.74 SY Flooring	90.50 LF Floor Perimeter
90.50 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
166. R&R Fluorescent light fixture	3.00 EA	112.41	9.41	69.32	415.96	(373.81)	42.15
167. Detach & Reset Fluorescent light fixture	5.00 EA	72.64	0.00	72.64	435.84	(0.00)	435.84
168. R&R Acoustic ceiling tile furring	510.66 SF	0.81	6.13	83.96	503.73	(147.22)	356.51
169. R&R Acoustic ceiling tile	510.66 SF	3.43	46.88	359.68	2,158.12	(777.73)	1,380.39
<b>Totals: Room9 (No Number)</b>			<b>62.42</b>	<b>585.60</b>	<b>3,513.65</b>	<b>1,298.76</b>	<b>2,214.89</b>

## Corridor

Height: 8'

2327.09 SF Walls	1392.50 SF Ceiling
3719.59 SF Walls & Ceiling	1392.50 SF Floor
154.72 SY Flooring	290.39 LF Floor Perimeter
293.39 LF Ceil. Perimeter	

Missing Wall 9' 10" X 8'  
Missing Wall - Goes to Floor 3' X 6' 8"

Opens into HALLWAY\_\_ST  
Opens into WOMENS\_BATH

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
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## CONTINUED - Corridor

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
170. R&R Acoustic ceiling tile	4.00 SF	3.43	0.37	2.82	16.91	(6.10)	10.81
171. Seal & paint acoustic ceiling tile	1,392.50 SF	0.95	24.23	269.42	1,616.53	(808.28)	808.25
172. Clean floor	1,392.50 SF	0.34	34.09	94.70	602.24	(0.00)	602.24
173. Clean the walls	2,327.09 SF	0.26	45.07	121.28	771.39	(0.00)	771.39
174. Paint the walls - two coats	2,327.09 SF	0.77	27.93	363.96	2,183.75	(1,091.88)	1,091.87
<b>Totals: Corridor</b>			<b>131.69</b>	<b>852.18</b>	<b>5,190.82</b>	<b>1,906.26</b>	<b>3,284.56</b>

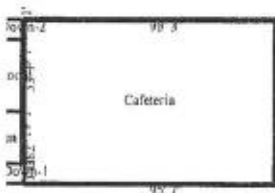


## Room6 (No Number)

Height: 8'

709.42 SF Walls	491.07 SF Ceiling
1200.49 SF Walls & Ceiling	491.07 SF Floor
54.56 SY Flooring	88.68 LF Floor Perimeter
88.68 LF Ceil. Perimeter	

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
175. R&R Acoustic ceiling tile	8.00 SF	3.43	0.73	5.62	33.79	(12.17)	21.62
176. Seal & paint acoustic ceiling tile	491.07 SF	0.95	8.54	95.00	570.06	(285.03)	285.03
<b>Totals: Room6 (No Number)</b>			<b>9.27</b>	<b>100.62</b>	<b>603.85</b>	<b>297.20</b>	<b>306.65</b>



## Cafeteria

Height: 8'

2463.56 SF Walls	5778.50 SF Ceiling
8242.06 SF Walls & Ceiling	5778.50 SF Floor
642.06 SY Flooring	307.17 LF Floor Perimeter
311.83 LF Ceil. Perimeter	

Missing Wall - Goes to Floor

4' 8" X 6' 8"

Opens into STAIRWAY\_DO

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
177. Paint masonry	2,463.56 SF	0.69	41.39	348.26	2,089.51	(1,044.77)	1,044.74
178. Paint door/window trim & jamb - 2 coats (per side)	5.00 EA	24.32	1.19	24.56	147.35	(73.68)	73.67



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## CONTINUED - Cafeteria

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
<b>HAZ-MAT</b>							
179. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress*	762.00 SF	0.84	49.52	128.66	818.26	(0.00)	818.26
180. Finish Carpenter - per hour - labor time to detach/reset folding partition door to facilitate floor replacement*	32.00 HR	63.75	0.00	408.00	2,448.00	(0.00)	2,448.00
181. Tear out asbestos vinyl floor covering (no haul off)	5,778.50 SF	2.84	58.94	3,293.96	19,763.84	(0.00)	19,763.84
182. Remove asbestos floor mastic (no haul off)	5,778.50 SF	3.47	17.34	4,013.74	24,082.48	(0.00)	24,082.48
183. HEPA Vacuuming - Detailed - (PER SF)	5,778.50 SF	0.75	312.04	866.78	5,512.70	(0.00)	5,512.70
184. Clean the floor	5,778.50 SF	0.50	211.74	578.56	3,679.55	(0.00)	3,679.55
185. Floor leveling cement / patch-in	5,778.50 SF	2.50	260.03	2,941.26	17,647.54	(17,647.54)	0.00
186. Vinyl tile	5,778.50 SF	3.51	766.23	4,209.74	25,258.51	(25,258.51)	0.00
187. Cove base molding - rubber or vinyl, 6" high	307.17 LF	2.46	31.33	157.38	944.35	(944.35)	0.00
<b>Totals: Cafeteria</b>			<b>1,749.75</b>	<b>16,970.90</b>	<b>102,392.09</b>	<b>44,968.85</b>	<b>57,423.24</b>

<b>Total: Main Level</b>	<b>2,865.41</b>	<b>27,135.74</b>	<b>163,643.52</b>	<b>72,269.70</b>	<b>91,373.82</b>
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## General Conditions

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
188. Commercial Supervision / Project Management - per hour	24.00 HR	74.50	0.00	357.60	2,145.60	(0.00)	2,145.60
189. General Laborer - per hour - h/d materials, general cleaning*	16.00 HR	37.53	0.00	120.10	720.58	(0.00)	720.58
190. Dumpster load - used for general demolition debris*	1.00 EA	761.00	0.00	152.20	913.20	(0.00)	913.20
191. Hazardous Waste/Mold Cleaning-Supervisory/Admin- per hour - full time supervision for abatement project*	80.00 HR	74.38	428.42	1,190.08	7,568.90	(0.00)	7,568.90
192. Neg. air fan/Air scrub.-XLrg (per 24 hr period)-No monit. - allow 1 unit per room/area for 2 days*	24.00 DA	140.00	241.92	672.00	4,273.92	(0.00)	4,273.92
193. Carbon vapor filter (for air scrubber) - 24" x 24"	6.00 EA	102.80	79.14	129.84	825.78	(0.00)	825.78
194. Dumpster load - asbestos abatement container	1.00 EA	1,400.00	100.80	280.00	1,780.80	(0.00)	1,780.80



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**CONTINUED - General Conditions**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
195. Asbestos test fee - post abatement testing*	1.00 EA	500.00	36.00	100.00	636.00	(0.00)	636.00
196. Final cleaning - construction - Commercial	16,087.00 SF	0.15	173.74	482.62	3,069.41	(0.00)	3,069.41
197. Taxes, insurance, permits & fees - TBD/excluded*	1.00 EA	0.00	0.00	0.00	0.00	(0.00)	0.00
<b>Totals: General Conditions</b>			<b>1,060.02</b>	<b>3,484.44</b>	<b>21,934.19</b>	<b>0.00</b>	<b>21,934.19</b>
<b>Line Item Totals: 18010765-UNITED-MUSL</b>			<b>5,405.70</b>	<b>43,735.80</b>	<b>264,672.06</b>	<b>110,233.46</b>	<b>154,438.60</b>

**Grand Total Areas:**

33,815.11 SF Walls	24,350.71 SF Ceiling	58,165.82 SF Walls and Ceiling
24,350.71 SF Floor	2,705.63 SY Flooring	4,205.94 LF Floor Perimeter
0.00 SF Long Wall	0.00 SF Short Wall	4,331.61 LF Ceil. Perimeter
24,350.71 Floor Area	25,287.13 Total Area	34,259.22 Interior Wall Area
11,288.28 Exterior Wall Area	1,254.25 Exterior Perimeter of Walls	
0.00 Surface Area	0.00 Number of Squares	0.00 Total Perimeter Length
0.00 Total Ridge Length	0.00 Total Hip Length	





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### Summary

Line Item Total	215,530.56
Material Sales Tax	3,096.77
Cleaning Mtl Tax	52.09
Subtotal	218,679.42
Overhead	21,867.90
Profit	21,867.90
Cleaning Sales Tax	2,256.84
<b>Replacement Cost Value</b>	<b>\$264,672.06</b>
Less Depreciation	(110,233.46)
<b>Actual Cash Value</b>	<b>\$154,438.60</b>
<b>Net Claim</b>	<b>\$154,438.60</b>
Total Recoverable Depreciation	110,233.46
<b>Net Claim if Depreciation is Recovered</b>	<b>\$264,672.06</b>



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### Recap of Taxes, Overhead and Profit

	Overhead (10%)	Profit (10%)	Material Sales Tax (6%)	Cleaning Mtl Tax (6%)	Cleaning Sales Tax (6%)	Clothing Acc Tax (6%)	Manuf. Home Tax (6%)	Storage Rental Tax (6%)
<b>Line Items</b>								
	21,867.90	21,867.90	3,096.77	52.09	2,256.84	0.00	0.00	0.00
<b>Total</b>	<b>21,867.90</b>	<b>21,867.90</b>	<b>3,096.77</b>	<b>52.09</b>	<b>2,256.84</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>



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### Recap by Room

Estimate: 18010765-UNITED-MUSL

#### Area: 2nd Floor

Room13	13,472.13	6.25%
Bathroom-1	2,696.89	1.25%
Room2 (No Number)	8,357.65	3.88%
Room11	8,003.31	3.71%
Room4 (No Number)	659.38	0.31%
Room5 (Office)	1,070.76	0.50%
Room9	11,211.09	5.20%
Room10	11,358.53	5.27%
Room8	4,543.25	2.11%
Room12	2,115.91	0.98%
Corridor	1,009.56	0.47%

#### Area Subtotal: 2nd Floor

64,498.46 29.93%

#### Area: Main Level

Room5	13,578.81	6.30%
Sump Room	693.11	0.32%
Room6	549.06	0.25%
Room1	886.19	0.41%
Room7	1,732.39	0.80%
Room3	13,701.14	6.36%
Room8	8,578.38	3.98%
Room11 (No Number)	2,685.31	1.25%
Room9 (No Number)	2,865.63	1.33%
Corridor	4,206.95	1.95%
Room6 (No Number)	493.96	0.23%
Cafeteria	83,671.44	38.82%

#### Area Subtotal: Main Level

133,642.37 62.01%

#### General Conditions

17,389.73 8.07%

#### Subtotal of Areas

215,530.56 100.00%

#### Total

215,530.56 100.00%



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### Recap by Category with Depreciation

O&P Items	RCV	Deprec.	ACV
ACOUSTICAL TREATMENTS	8,025.57	3,370.74	4,654.83
CABINETRY	382.13		382.13
CLEANING	4,501.10		4,501.10
CONCRETE & ASPHALT	28,333.79	28,333.79	0.00
GENERAL DEMOLITION	75,696.88		75,696.88
DRYWALL	1,373.52	576.86	796.66
FLOOR COVERING - CARPET	3,103.03	3,103.03	0.00
FLOOR COVERING - VINYL	43,351.51	43,351.51	0.00
FINISH CARPENTRY / TRIMWORK	2,040.00		2,040.00
FINISH HARDWARE	92.82		92.82
HAZARDOUS MATERIAL REMEDIATION	26,792.97		26,792.97
LABOR ONLY	2,388.48		2,388.48
LIGHT FIXTURES	2,528.82	2,020.34	508.48
PAINTING	16,749.92	8,375.01	8,374.91
STUCCO & EXTERIOR PLASTER	170.02	107.11	62.91
O&P Items Subtotal	215,530.56	89,238.39	126,292.17
Material Sales Tax	3,096.77	2,622.75	474.02
Cleaning Mtl Tax	52.09		52.09
Overhead	21,867.90	9,186.16	12,681.74
Profit	21,867.90	9,186.16	12,681.74
Cleaning Sales Tax	2,256.84		2,256.84
Total	264,672.06	110,233.46	154,438.60

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Defendant's Notice of Removal** was served via email and first-class U.S. Mail, postage prepaid, this 7th day of May, 2019, on the following counsel of record:

Stan Shnyder, Esq.  
Kats, Jamison & Associates  
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*Counsel for Plaintiff*

  
Alexandra Rogin, Esq.